

REMARKS

Claims 55-81 are pending in this application, of which claims 55, 64, and 73 are independent. Claim 82 has been canceled without prejudice. Favorable reconsideration of the final action mailed February 6, 2007 is requested in view of the following remarks.

35 U.S.C. § 112, first paragraph rejections

Claims 55-81 were rejected under 35 U.S.C. § 112, first paragraph, as allegedly failing to comply with the written description requirement. In rejecting the claims, the examiner stated:

The claim(s) contains subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention. The specification, as originally filed does not provide support for the invention as is now claimed, i.e., overlay application. This term is not defined in the specification. The specification describes a first login page rather than an overlay application. There is not sufficient support in the specification as to how the login screen is presented.

The applicant disagrees. MPEP 2163.02 states in relevant part:

Under *Vas-Cath, Inc. v. Mahurkar*, 935 F.2d 1555, 1563-64, 19 USPQ2d 1111, 1117 (Fed. Cir. 1991), to satisfy the written description requirement, an applicant must convey with reasonable clarity to those skilled in the art that, as of the filing date sought, he or she was in possession of the invention, and that the invention, in that context, is whatever is now claimed. The test for sufficiency of support in a parent application is whether the disclosure of the application relied upon "reasonably conveys to the artisan that the inventor had possession at that time of the later claimed subject matter." *Ralsion Purina Co. v. Far-Mat Co., Inc.*, 772 F.2d 1570, 1575, 227 USPQ 177, 179 (Fed. Cir. 1985) (quoting *In re Kaslow*, 707 F.2d 1366, 1375, 217 USPQ 1089, 1096 (Fed. Cir. 1983)) ... *The subject matter of the claim need not be described literally (i.e., using the same terms or in haec verba) in order for the disclosure to satisfy the description requirement.*

Although the term "overlay application" is not expressly recited, the applicant respectfully submits that the specification, as originally filed, provides support for this feature of the claims. For example, page 5, lines 19-25 describes "applications 22b" and "code 22a," which are computer programs stored in a memory 21 residing at a server 14; the specification on page 5, line 24 – page 6, lines 7 with respect to "applications 22b" provides support for embodiments of the "remote user applications" of the claims; the specification on page 6, lines 8-21 with respect to "code 22a" provides support for embodiments of the "overlay application" of the claims. Other portions of the specification, including the description at page 7, line 29 – page 9, line 31, page 10, line 25 – page 12, line 21, and the corresponding figures, provides further support for the features of the claims. The applicant requests withdrawal of the 35 U.S.C. § 112, first paragraph, rejections of claims 55-81.

35 U.S.C. § 103 rejections

Claims 55-58, 60-67, 69-76, and 78-81 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Rich et al. (US 5,918,228) in view of Nielsen (US 6,006,333).

Rich describes its invention succinctly in the Abstract:

A method of enabling a Web server to impersonate a Web client to thereby obtain access to files stored in a distributed file system of a distributed computing environment. The distributed computing environment includes a security service for returning a credential to a user authenticated to access the distributed file system. In response to receipt of a transaction request from the Web client, a determination is made whether the transaction request has originated from a user authenticated to access the distributed file system. If so, the Web server is controlled to reuse the credential of the user across multiple file accesses in the distributed file system on behalf of the Web client.

The distributed file system of Rich provides a uniform global filespace which allows all DFS client users to see the same view of the filespace. (col. 5, lines 4-6). In operation:

When the client 10 (through the browser 16) requests a DFS document (step a), the Web server 18 invokes a server path check (using the SAF plug-in 25)(step b). The PathCheck checks with the session manager 27 to determine whether the user has appropriate DCE credentials. If not (step c), the SAF plug-in 25 will return an error message (e.g., "401; Unauthorized") to the browser 16 (step d) and prompt the user for user id and password. After getting the user id and password from the user (step e), the SAF plug-in invokes the session manager 27

(step f) to obtain the DCE credential for the user. Session manager 27 returns the DCE credential to the Web server (step g). The server then uses this user credential to represent the user to retrieve documents stored in DFS 50 (step h). After retrieving the documents, the account manager 56 is invoked (step i) (preferably using another API plug-in) to save appropriate usage information into the database 58 (step j).

The session manager 27 is thus invoked by the Web Server when a user attempts to access a DFS file. If a user has already been authenticated by DCE, the Session Manager 27 returns the user credential to the server, which uses this credential to retrieve DFS documents on behalf of the user. If not, the Session Manager 27 will login for the user and obtain the credential from DCE Security. The Session Manager maintains the in-memory database 29 to keep track of which user has logged in so that a user may access multiple DFS pages.

Rich discloses enabling a web server to impersonate an authenticated user while retrieving documents from the DFS. However, claim 55 calls for more. Claim 55 recites a method that includes "receiving through a first Web page of an overlay application, identification information associated with a first party; using the identification information to identify one or more remote user applications that are available for use by the first party ..." In rejecting claim 55, it appears that the examiner reads the "documents stored in DFS" as corresponding to the "one or more remote user applications" of claim 55. Even with such a correspondence of elements, which the applicant submits is beyond the "plain and ordinary meaning" of the term "remote user application," the examiner has failed to identify in Rich any disclosure or suggestion of "receiving through a second Web page of the overlay application, a selection of a first of the one or more remote user applications and an account identifier representative of an account of a second party," as recited in claim 55. Once a user is authenticated, the Rich web server uses the authenticated user's credential to impersonate the authenticated user while accessing documents stored in the DFS. There is no suggestion of "receiving ... an account identifier representative of an account of a second party," much less "using both the identification information [associated with the first party] and the account identifier [representative of an account of a second party] to verify that the first party is authorized to access the account of the second party," as recited in claim 55. Should the examiner maintain her reliance on Rich for these features of claim 55, the examiner is respectfully requested to point out with specificity where Rich discloses "receiving ... an account identifier representative

of an account of a second party; ... [and] using both the identification information [associated with the first party] and the account identifier [representative of an account of a second party] to verify that the first party is authorized to access the account of the second party." as recited in claim 55.

The applicant agrees with the examiner that Rich does not disclose or suggest "as a result of the verification [that the first party is authorized to access the account of the second party], generating a third Web page of the overlay application that, when rendered by a Web browser, provides a view and information that is substantially similar to a view and information of a Web page that would be provided to the second party when the second party accesses the account through the first of the one or more remote user applications." The examiner relies on Nielsen for this disclosure.

Nielsen describes its invention succinctly in the Abstract:

A user operating a client system may access a plurality of remote servers requiring passwords for access by employing a master password. The master password is used to decrypt a stored password for a particular remote server to which the client desires access. The client system maintains a database of encrypted passwords and user IDs for remote servers to which the user is registered. Although each remote server is accessed using a different password, the user need only remember one master password. Since only the master password need be remembered, the passwords particular to specific remote sites may be made more random and thus more secure. Implementation of the password management system need not require modification of any remote servers.

The portions of Nielsen relied upon by the examiner describe the manner in which a user may interact with Nielsen's password management system to manage password information for access to multiple controlled access remote servers. Nielsen does not contemplate enabling one party to access an account of another party. At most, Nielsen discloses techniques to enable a user to enter a single master password to gain access to his own accounts that are hosted at multiple remote servers. Nielsen does not disclose or suggest "as a result of the verification [that the first party is authorized to access the account of the second party], generating a third Web page of the overlay application that, when rendered by a Web browser, provides a view and information that is substantially similar to a view and information of a Web page that would be

provided to the second party when the second party accesses the account through the first of the one or more remote user applications," as recited in claim 55.

Even if Rich is modified to include the features of Nielsen in the manner suggested by the examiner, the hypothetical combination still does not disclose or make obvious all of the features of claim 55. For at least these reasons, claim 55 is allowable over Rich in view of Nielsen.

Claim 64 has limitations corresponding to the limitations of claim 55 and is allowable for at least the same reasons.

Claim 73 has limitations corresponding to the limitations of claim 55 and is allowable for at least the same reasons.

All of the dependent claims are allowable for at least the same reasons set forth with respect to the claims from which they depend.

Claims 59, 68, and 77 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Rich in view of Nielsen and further in view of Sampson et al. (US 5,802,499).

Cols. 15 and 16 of Sampson disclose access profile rights that specify what actions may be carried out by a user in relation to a customer account. Sampson does not cure the deficiencies of Rich and Nielsen. No portion of Sampson, cited by the examiner or otherwise, provides any disclosure or suggestion of "receiving ... identification information associated with a first party; using the identification information to identify one or more remote user applications that are available for use by the first party ...; receiving ... a selection of a first of the one or more remote user applications and an account identifier representative of an account of a second party; using both the identification information and the account identifier to verify that the first party is authorized to access the account of the second party; and as a result of the verification, generating a third Web page ... that ... provides a view and information that is substantially similar to a view and information of a Web page that would be provided to the second party when the second party accesses the account through the first of the one or more remote user applications," as recited in claim 55, from which claim 59 depends.

Claims 68 and 77 are allowable for at least the same reasons.

Conclusion

For the foregoing reasons, the applicant submits that all the claims are in condition for allowance.

By responding in the foregoing remarks only to particular positions taken by the examiner, the applicant does not acquiesce with other positions that have not been explicitly addressed. In addition, the applicant's arguments for the patentability of a claim should not be understood as implying that no other reasons for the patentability of that claim exist.

Please apply any other charges or credits to deposit account 06-1050, referencing Attorney Docket No. 08575-048001.

Respectfully submitted,

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